

FILED

JUN 18 2013

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA)

v.)

SALVADOR ELIAS,
also known as "Kasper,")

ADRIAN ELIAS,
also known as "Soldier,")

ANGEL OLSON,
DEMETRIO BENITEZ,
also known as "Conejo,")

MIGUEL LEDESMA,)

PAUL REDING,)

CORNELIUS SISTRUNK,
also known as "C.J.,")

DEERIC STEVENS, and)

MISHON WASHINGTON,)

No. 13 CR 476

JUDGE LEINENWEBER

Violations: Title 18, United States
Code, Sections 922(g)(1), 924(c)(1)(A),
1951(a), and Title 21, United States
Code, Section 846

MAGISTRATE JUDGE SCHENKIER

COUNT ONE

The SPECIAL AUGUST 2012 GRAND JURY charges:

Beginning on or about May 14, 2013, and continuing to on or about June 4, 2013, in
the Northern District of Illinois, Eastern Division, and elsewhere,

SALVADOR ELIAS, also known as "Kasper,"
ADRIAN ELIAS, also known as "Soldier,"
ANGEL OLSON,
DEMETRIO BENITEZ, also known as "Conejo,"
MIGUEL LEDESMA,
PAUL REDING,
CORNELIUS SISTRUNK, also known as "C.J.,"
DEERIC STEVENS, and
MISHON WASHINGTON,

defendants herein, did conspire with each other, and others known and unknown to the Grand Jury, to obstruct, delay, and affect commerce and the movement of any article in commerce by robbery, as "robbery" and "commerce" are defined in Title 18, United States Code, Section 1951(b), namely, the robbery of individuals whom defendants believed to be involved in the distribution of controlled substances, including cocaine;

In violation of Title 18, United States Code, Section 1951(a).

COUNT TWO

The SPECIAL AUGUST 2012 GRAND JURY further charges:

On or about June 4, 2013, in the Northern District of Illinois, Eastern Division, and elsewhere,

SALVADOR ELIAS, also known as "Kasper,"
ADRIAN ELIAS, also known as "Soldier,"
ANGEL OLSON,
DEMETRIO BENITEZ, also known as "Conejo,"
MIGUEL LEDESMA,
PAUL REDING,
CORNELIUS SISTRUNK, also known as "C.J.,"
DEERIC STEVENS, and
MISHON WASHINGTON,

defendants herein, did knowingly attempt to obstruct, delay, and affect commerce, and the movement of articles and commodities in such commerce, by robbery, as "commerce" and "robbery" are defined in Title 18, United States Code, Section 1951(b), namely, the robbery of individuals whom defendants believed to be involved in the distribution of controlled substances, including cocaine;

In violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT THREE

The SPECIAL AUGUST 2012 GRAND JURY further charges:

Beginning on or about May 14, 2013, and continuing to on or about June 4, 2013, in the Northern District of Illinois, Eastern Division, and elsewhere,

SALVADOR ELIAS, also known as "Kasper,"
ADRIAN ELIAS, also known as "Soldier,"
ANGEL OLSON, and
PAUL REDING,

defendants herein, conspired with each other and with Demetrio Benitez, Miguel Ledesma, Cornelius Sistrunk, Deeric Stevens, Mishon Washington, and others known and unknown to the Grand Jury, knowingly and intentionally to possess with intent to distribute a controlled substance, namely, five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1);

In violation of Title 21, United States Code, Section 846.

COUNT FOUR

The SPECIAL AUGUST 2012 GRAND JURY further charges:

On or about June 4, 2013, in the Northern District of Illinois, Eastern Division, and elsewhere,

SALVADOR ELIAS, also known as "Kasper,"
ADRIAN ELIAS, also known as "Soldier,"
ANGEL OLSON, and
PAUL REDING,

defendants herein, did attempt to knowingly and intentionally possess with intent to distribute a controlled substance, namely, five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1);

In violation of Title 21, United States Code, Section 846, and Title 18, United States Code, Section 2.

COUNT FIVE

The SPECIAL AUGUST 2012 GRAND JURY further charges:

On or about June 4, 2013, in the Northern District of Illinois, Eastern Division, and elsewhere,

SALVADOR ELIAS, also known as "Kasper,"
ADRIAN ELIAS, also known as "Soldier,"
ANGEL OLSON,
DEMETRIO BENITEZ, also known as "Conejo,"
PAUL REDING,
CORNELIUS SISTRUNK, also known as "C.J.,"
DEERIC STEVENS, and
MISHON WASHINGTON,

defendants herein, knowingly possessed a firearm, namely:

- (1) A Charter Arms Pathfinder .22 caliber revolver bearing serial number 678837;
- (2) A Ruger Single-Six .22 caliber revolver bearing serial number 5162; and
- (3) A JC Higgins Model 20 .12 gauge shotgun bearing no serial number,

in furtherance of a crime of violence and a drug trafficking crime for which they may be prosecuted in a court of the United States, namely, violations of Title 18, United States Code, Section 1951(a), as set forth in Counts One and Two of this Indictment, a violation of Title 21, United States Code, Section 846, as set forth in Count Three of this Indictment, and a violation of Title 21, United States Code, Sections 841(a)(1) and 846, as set forth in Count Four of this Indictment;

In violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT SIX

The SPECIAL AUGUST 2012 GRAND JURY further charges:

On or about June 4, 2013, in the Northern District of Illinois, Eastern Division, and elsewhere,

SALVADOR ELIAS, also known as "Kasper,"

defendant herein, having previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess a firearm and ammunition, namely:

- (1) A Charter Arms Pathfinder .22 caliber revolver bearing serial number 678837;
- (2) A Ruger Single-Six .22 caliber revolver bearing serial number 5162;
- (3) A JC Higgins Model 20 .12 gauge shotgun bearing no serial number;
- (4) Approximately 132 rounds of .22 caliber ammunition; and
- (5) Approximately one .12 gauge shotgun shell,

which firearm and ammunition was in and affecting interstate commerce in that it had traveled in interstate commerce before coming into defendant's possession;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT SEVEN

The SPECIAL AUGUST 2012 GRAND JURY further charges:

On or about June 4, 2013, in the Northern District of Illinois, Eastern Division, and elsewhere,

MISHON WASHINGTON,

defendant herein, having previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess a firearm, namely a Charter Arms Pathfinder .22 caliber revolver bearing serial number 678837, which firearm was in and affecting interstate commerce in that it had traveled in interstate commerce before coming into defendant's possession;

In violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATION

The SPECIAL AUGUST 2012 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 21, United States Code, Section 846, defendants SALVADOR ELIAS, ADRIAN ELIAS, ANGEL OLSON, and PAUL REDING shall forfeit to the United States of America any property used, and intended to be used, in any manner or part, to commit, and to facilitate the commission of the offense.

2. Upon conviction of an offense in violation of Title 18, United States Code, Sections 922(g), 924(c), and 1951(a), defendants SALVADOR ELIAS, ADRIAN ELIAS, ANGEL OLSON, DEMETRIO BENITEZ, MIGUEL LEDESMA, PAUL REDING, CORNELIUS SISTRUNK, DEERIC STEVENS, and MISHON WASHINGTON shall forfeit to the United States of America any firearms and ammunition involved in and used in the commission of the offense.

3. Upon conviction of committing or attempting to commit a felony in violation of any law of the United States involving the use of threats, force, or violence or perpetrated in whole or in part by the use of firearms, the Court may, in addition to the penalty provided by law for such offense, order the confiscation and disposal of firearms and ammunition found in the possession or under the immediate control of the defendant at the time of his arrest.

4. The property to be forfeited includes, but is not limited to the following specific property:

a. One Charter Arms Pathfinder .22 caliber revolver, serial number

678837;

- b. One Ruger Single-Six .22 caliber revolver, serial number 5162;
- c. A JC Higgins Model 20 .12 gauge shotgun bearing no serial number;
- d. Approximately 132 rounds of .22 caliber ammunition; and
- e. Approximately one .12 gauge shotgun shell;

All pursuant to Title 18, United States Code, Sections 924(d) and 3665; Title 21, United States Code, Sections 853(a)(2); and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY